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COMMISSION

OFFICE OF COUNSEL

MICHAEL H. BADER
ADMITTED IN VA AND D.C.

July 25, 1996

OUR FILE NO.
0066-101-65

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

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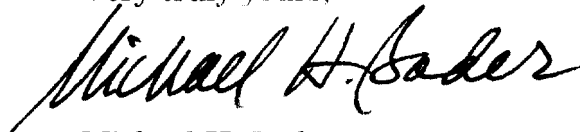
Re: Radio Station KVTI (NCE-FM)
Tacoma, Washington
Clover Park Technical College
MM Docket 96-62

Dear Mr. Caton:

I transmit herewith an original and nine copies of the Reply Comments of noncommercial educational FM station KVTI(NCE-FM), Tacoma, Washington, in regard to the blanketing rulemaking presently pending before the Commission.

Kindly communicate any questions regarding this matter to this office directly.

Very truly yours,



Michael H Bader

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Enclosures

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ORIGINAL

Before The
Federal Communications Commission

Washington, D.C. 20554

In The Matter Of)
)
Amendment of Parts 73 of)
the Commission's Rules to More)
Effectively Resolve Broadcast)
Blanketing Interference,)
Including Interference to Consumer)
Electronics and Other)
Communications Devices)

MM Docket No. 96-62

TO: The Commission, *en banc*

**REPLY COMMENTS OF CLOVER PARK TECHNICAL COLLEGE
(KVTI(NCE-FM), TACOMA, WASHINGTON)**

Clover Park Technical College, by its attorneys, hereby submits its
reply comments regarding the Commission's *Notice of Proposed Rule Making*
of April 26, 1996, concerning blanketing.

The comments filed on June 25, 1996, draw a clear line between the
rights and obligations of broadcast stations on the one hand and the demands
and claims of manufacturers of electronic and other equipment on the other
hand. Broadcasters, who for many years have respected the integrity of the
FCC's radio and television allocation system, as well as the obligations
imposed on them to provide service without causing undue interference to the
reception of such service, believe that there is no need for fundamental change
in the Commission's rules and policies on the subject. Certain manufacturers
and representatives of interests other than broadcasting argue that there
should be a fundamental change which in the final analysis would impose on

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broadcasters an obligation to fix, repair, service, and otherwise worry about practically every telephone, radio, boombox, VCR, tape recorder, and computer, not to mention everything else that can be designed in the future to take advantage of the technology being developed in the United States and abroad.

We think that the comments of the National Association of Broadcasters as one example are correct, and that the comments of organizations such as the Consumer Electronics Manufacturers Association are entirely out of order.

Clover Park brings to this matter an extensive history of cooperation with the Federal Communications Commission as well as members of the public in implementing the long-existing rules on blanketing. It has provided assistance to the public where needed and appropriate, and it has cooperated with all parties and interests.

In the course of Clover Park's experience, it has come to our attention that the majority of consumer complaints are the result of inadequately designed consumer equipment. In many other cases, the fault lies with improper installation. Time and again in the experience of Clover Park the cause of the consumer complaint has not been the broadcast station, but the householder, the small business, or the other user of poorly designed equipment.

This is not to say that all cases referred to KVTI have been the fault of the designer of the equipment or the owner thereof. Where there has been a legitimate complaint of blanketing, Clover Park has resolved it.

But in the course of addressing the various complaints, we see that some of the faults of the proposal herein and the basic comments include the following:

- Extending the blanketing rule to any function of any device which contains a tuner even if the tuner itself is not affected. Examples include boombox and mini-stereo systems as well as VCRs.
- Camcorders are not protected, but a VCR with a tuner is—even if the tuner section is neither affected nor used by the consumer.
- More and more there seems to be emphasis on resolving problems of telephones, many of which are cheap and indiscriminate and never before accorded protection from broadcast station transmissions.

Clover Park has also noticed that the technology of developing equipment seems to invite the application of some rule requiring a broadcast station to resolve any problem of design. For example, radio and TV tuner cards are now available for desktop computers. They are employed as individual units and as parts of networks. They often involve a combination with telephone systems and Internet communications. Certainly there is no basis for extending to such equipment the obligation of a broadcast station to resolve any design problem. Rather, the FCC should encourage, and where possible,

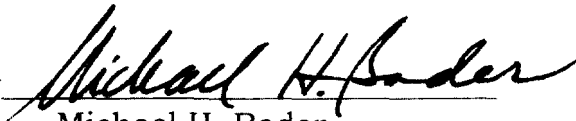
require the manufacturers of such equipment to avoid the potential for blanketing.

Under all the circumstances Clover Park Technical College urges the Commission to maintain the status quo and focus on what is the real problem—poorly designed equipment. The secondary and corollary problem is the lack of maintenance of equipment once installed.

Under the circumstances, Clover Park Technical College believes that the Commission should not look upon the broadcasting stations as the savior of all equipment users, nor should it impose on broadcast stations the obligations which are properly and correctly assigned to the manufacturers of equipment.

Respectfully submitted,

CLOVER PARK TECHNICAL COLLEGE

By 
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Its Attorney

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